

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF OKLAHOMA**

**WAKE ENERGY, LLC, on behalf of
itself and all others similarly situated,**

Plaintiff,

v.

**MUSTANG FUEL CORPORATION
And MUSTANG GAS PRODUCTS,
LLC,**

Defendants.

Case No. 22-cv-364-RAW-GLJ

**DECLARATION OF JODI C. COLE REGARDING NOTICE
OF PROPOSED SETTLEMENT PURSUANT TO 28 U.S.C. §1715**

I, Jodi C. Cole, declare and state:

1. I have personal knowledge of the facts set forth in this Declaration.
2. I am a shareholder in the law firm of McAfee & Taft, counsel for Mustang Fuel Corporation and Mustang Gas Products, LLC (“Mustang”) in the above-referenced matter.
3. I submit this Declaration to inform the Court of Mustang's compliance with the notice requirements of the Class Action Fairness Act, 28 U.S.C. § 1715 (“CAFA Notice”).
4. I personally supervised and participated in the preparation and sending of the notices required by 28 U.S.C. §1715 to the U.S. Attorney General and the Attorneys General identified in the attached Exhibit 1 (*i.e.* every State in which a putative class member owning an interest in the Class Wells resided, according to the information available to Canvas).

5. The CAFA Notices were mailed on June 10, 2024, by U.S. Mail, certified mail, and return receipt requested. Exhibit 1 also identifies the date each Notice was received by the Attorney General's office.

6. True and correct copies of each CAFA Notice are attached hereto as Exhibit 2.

7. True and correct copies of the documents referenced in the CAFA Notice are attached as follows:

Exhibit 3 – Complaint

Exhibit 4 – Stipulation and Agreement of Settlement

Exhibit 5 – Estimated Percentage of Settlement Funds

8. To the best of my knowledge, Mustang has fully complied with the notice requirements of 28 U.S.C. § 1715 and has satisfied all of its obligations thereunder.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 26, 2024.

/s/ Jodi C. Cole

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